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June 7, 2006

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California Air Resources Board
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Re: Comments Regarding CARB's Proposed Amendments to the Regulation for the Statewide Portable Equipment Registration Program.

The California Air Pollution Control Officers Association (CAPCOA) appreciates the opportunity to submit comments regarding the proposed amendments of Title 13, California Code of Regulations (CCR), Sections 2450 et seq., which is the Statewide Portable Equipment Registration Program (PERP), released for public review on May 5, 2006.

CAPCOA supports the proposed revisions. During the February 26, 2004 CARB hearing to adopt amendments to the PERP, CAPCOA raised a number of concerns related to the enforceability of the regulation. At that meeting, the Board asked CARB staff to work with CAPCOA and the affected industries to develop amendments to the regulation that would address the identified concerns. Pursuant to the wishes of the Board, CAPCOA, CARB staff, and a consortium of industry representatives formed the PERP Consensus Development Workgroup and collaboratively developed a proposal for amendments to the PERP. We believe that the amendments contained in the May 5, 2006 proposed rule faithfully implement the proposal developed by the workgroup and address CAPCOA's concerns that were expressed at the February 2004 hearing.

We would like to thank CARB staff who worked with us on this endeavor for their collaborative professionalism, and their dedication to working with CAPCOA and industry to develop an effective, efficient, and enforceable portable equipment registration program. We are pleased that we can offer our unqualified support for the proposed amendments.

Sincerely,

Barbara Lee
President, CAPCOA

cc: Catherine Witherspoon, Executive Officer